

# Aquifer Exemption Proposal Status

## Lynch Canyon



AE Application	EPA makes a ruling on the aquifer exemption status
Lynch Canyon - Lanigan	

**Status:** *Complied requested data.*

- On track - Anticipate reverting data package to EPA by end of Nov 2022.

**Current Activities:**

**July 2022:** Discussed remaining deliverables with SWB. No new data created.

**August 15, 2022:** Responses shared with US EPA informally.

**September 9, 2022:** Engineer is finalizing updates to US EPA review. District will meet with US EPA next week with an updated data.

**October 14, 2022:** District met with US EPA to discuss final comments.

**November 10, 2022:** Working with SWB and HQ UIC to resolve GIS mapping issues

**Anticipated Next Steps:**

Once responses have been reviewed by US EPA, Northern District will share the package with HQ to have Uduak sign the "Uduak Letter" and then formally submit the package to US EPA.

# Aquifer Exemption Proposal Status

## Sespe



AE Application	EPA makes a ruling on the aquifer exemption status
Sespe	

**Status:** *US EPA comments have been shared with the operator.*

- On track - Anticipate reverting data package to EPA by Nov 2022.

### Current Activities:

**June 13, 2022:** Discussed package with District staff and will transmit data to SWB by end of week.

**July 18, 2022:** Met with US EPA and SWB over recent Sespe AE comments.

**August 15, 2022:** Responses to US EPA comments to be shared with SWB by 08/22/22.

**September 9, 2022:** SWB has reviewed responses and provided feedback.

**October 13, 2022:** District to meet with US EPA to review responses prior to submitting.

**November 10, 2022:** *Worked with operator to update responses to US EPA comments. Received additional data from City of Fillmore and SWB on nearby water wells.*

### Anticipated Next Steps:

*District will compile additional data, update the responses to US EPA, and set up phone call to discuss.*

# Aquifer Exemption Proposal Status

## Lompoc



AE Application	CalGEM send AE application package to EPA
Lompoc	Late Dec-22

**Status:** Public comment period documents created by District.

- On track. Expected to send package to EPA this year.

### Current Activities:

**July 18, 2022:** Northern District received comments back from Legal and has worked on the technical comment responses.

**August 15, 2022:** Responses to the technical comments have been completed by Northern District and will be sent back to DOC Legal for approval on 08/16/22.

**September 9, 2022:** Responses to public comment have been shared with DOC Legal.

**October 14, 2022:** District updated public comment responses and have shared with DOC Legal.

**November 10, 2022:** Responses to public comment shared with SWB.

**November 15, 2022:** WaterBoard provided feedback on public comment summaries and responses.

### Anticipated Next Steps:

SWB working on drafting the final concurrence letter.

# Aquifer Exemption Proposal Status

## Holser



AE Application	CalGEM send AE application package to EPA
Holser	Dec-22

**Status:** Comments on public comment period documents received from SWB.

- On track due to few comments received. Expected to send package to EPA this year.

### Current Activities:

**August 15, 2022:** DOC Legal has shared the responses to public comment with SWB.

**September 9, 2022:** SWB has reviewed and provided feedback to responses to public comment. District is working with DOC Legal on finalizing responses.

**October 13, 2022:** CalGEM has updated the responses to public comment with SWB comments and will ensure package is complete prior to issuance of SWB final concurrence letter.

**November 10, 2022:** Responses to public comment finalized. SWB has drafted a final concurrence letter and will update management for signing.

### Anticipated Next Steps:

With the final concurrence letter signed, CalGEM will prepare the entire AE package to share with Natural Resources Agency for review.

## Oxnard Conduit Analysis



Problem well Identification Goals	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22
Oxnard - Operator's title and Plugged wells review. Data submission to CalGEM									
Oxnard - CalGEM Review									
Oxnard - WaterBoard Review									

**Conduit Analysis Status:** Letter has been sent to CalNRG ensuring no injection in this area. No longer a non-compliant AE. A formal update letter will be sent to EPA after suspension of injection in Mt. Poso.

### Current Activities:

**April 15, 2022:** CalGEM HQ completed and signed a "Notice to Suspend Injection" letter to CalNRG for the steam injection project in the Oxnard field.

### Anticipated Next Steps:

- Northern District has reassigned the engineer working on the Oxnard conduit analysis to the Cat Canyon conduit analysis. CalNRG will continue to work on the conduit analysis documents. Northern District will return to the Oxnard conduit analysis once the Cat Canyon conduit analysis is complete.

## Cat Canyon Conduit Analysis



Problem well Identification & Remediation/Monitoring Plan	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Cat Canyon - Idle and Plugged wells review: Data submission to CalGEM									
Cat Canyon - CalGEM Review									
Cat Canyon - Water Board Review									
Meeting with Operators to discuss identified problem wells									
Operator submits the remediation/monitoring plan									

Conduit Analysis Status: Behind 3 months

### Current Activities:

**September 9, 2022:** Data packages received from B.E. Conway, Cat Canyon Resources, and Vaquero. District engineers are currently reviewing.

**October 13, 2022:** Data from B.E. Conway and Team Operating are ready for District final review. Cat Canyon Resources data package looks accurate and will be reviewed after completing the two operator packages.

**November 10, 2022:** Data packages for B.E. Conway, Team Operating, and Vaquero reviewed and ready to share with SWB on 11/14/22. Comments sent back to CCR for updates. District is updating non-Active operator package.

### Anticipated Next Steps:

SWB to begin reviewing data packages. Non-Active operator package to be updated with ~60 wells that were initially created by Vaquero.

# Midway Sunset II (Tulare) Conduit Analysis



Problem well Identification & Remediation/Monitoring Plan	Nov-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
MWSS - Idle and Plugged wells review, data submission to CalGEM											
MWSS - CalGEM Review											
MWSS - Water Board Review											
Meeting with Operators to discuss identified problem wells											
Operator submits the remediation/monitoring plan											
CalGEM/WB review and consult with operator's remediation/monitoring plan											

**Conduit Analysis Status: Behind 2 Months (Monitoring Plan Submittal Stage)**

**Current Activities:**

Well Status	Conduit analysis : MWSS		
	Meets Standard	Does not meet standard, requires review	Sum
Idle	27	3	30
P & A	9	87	96
Sum	32	94	126

**October 5<sup>th</sup>, 2022:** CalGEM and WB discussed the monitoring plan. Meeting with WB scheduled for 18<sup>th</sup> October 2022.

**October 11<sup>th</sup>, 2022:** Conduit Evaluation - Remediation/Monitoring Plan Expectations Document provided to Operator.

**November 8<sup>th</sup>, 2022:** The WBs and HQ met to discuss the path forward for

- (1) monitoring and remediation for wells outside AOR
- (2) unsaturated (air sand) wells
- (3) using EPA Water Usage feasibility Study as basis for characterizing BWF and USDW

**Anticipated Next Steps:**

- Final decision will come after Nov. 15<sup>th</sup> meeting between CalGEM and WBs. AF team met with the Operator lead to deliver an update on the status.
- Monitoring and Remediation plan and submit to WB for review.

# Kern River Conduit Analysis



Problem well Identification & Remediation/Monitoring Plan	Nov-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
Kern River - table and suggested wells review. Data submission to CalGEM											
Kern River - CalGEM Review											
Kern River - Water Board Review											
Meeting with Operators to discuss identified problem wells											
Operator submits the remediation/monitoring plan											
CalGEM/WB review and concar with operator's remediation/monitoring plan											

Conduit Analysis Status: Behind 3 Months (Monitoring Plan Submittal Stage)

Current Activities:

Well Status	CalGEM conduit analysis Kern River		Sum
	Meets Standards	Does not meet standards requires review	
WDE	11	3	14
P&A	54	10	64
Sum	65	13	78

**August 30<sup>th</sup> 2022:** Operator submitted a draft of the monitoring plan. CalGEM provided the feedback.

**September 6<sup>th</sup> 2022:** Operators confirmed the data is being worked on and to be reviewed by Professional Geologist prior to submission.

**September 13<sup>th</sup> 2022:** The operator submitted the draft monitoring plan.

**September 20<sup>th</sup> 2022:** WB provided input to the monitoring plan. Operator requested meeting with WB.

**October 11<sup>th</sup> 2022:** Conduit Evaluation – Remediation/Monitoring Plan Expectations Document provided to Operator.

**November 8<sup>th</sup> 2022:** The WBs and HQ met to discuss the path forward for (1) monitoring and remediation for wells outside AOR.

Anticipated Next Steps:

Final decision will come after Nov. 15th meeting between CalGEM and WBs. AE team met with Operator lead to deliver update on status. Monitoring and remediation plan and submit to WB for review.



# Mt Poso Dorsey Conduit Analysis



Problem well Identification Goals	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22
Meeting with Operators											
Mount Poso - Idle and Plugged wells review, Data											
Submission to CalGEM											
Mount Poso - CalGEM Review											
Mount Poso - WaterBoard Review											

Conduit Analysis status: Complete- CalGEM and WB concur on results. 5 of 6 wells identified as problematic. 1 well meets standards.

## Current Activities:

**March 7th, 2022:** Verbally conveyed to the Operator regarding issues with AOR radius of the well Mon 760 (029-73394) being outside the AE boundary and need to cease injection.

**April 4th, 2022:** Met with Cimarron Oil LLC agent. Communicated our concern of AOR review and migration of injection water outside the approved AE.

**April 12th, 2022:** Sent operator a letter for signature to voluntary cease injection on to MON 760. Operator expressed unwillingness to sign quoting pending litigation.

**April 15th, 2022:** Review various options such as current injection and radius of influence.

**May 24th, 2022:** Met with SWB and RWCB to discuss application viability and timeline.

**31st May 2022:** Met with District leadership and forwarded recommendation for cease injection on MON 760 to HQ for review.

**16th June 2022:** Letter to suspend injection in Mon 760 has been drafted. Letter will be sent to operator in 1-2 weeks. A formal letter will be sent to EPA after suspension of injection in Mt. Poso.

**July 8th, 2022:** Cease injection letter sent to Operator. Operator representative acknowledge receipt.

**July 16th, 2022:** Water injection into Mon. #760 has been terminated effective 7/16/2022.

**July 19th, 2022:** Field Unit verified injection lines disconnected.

**August 11th, 2022:** Operator and representative discussed with CalGEM the decision to cease injection on to MON 760.

## Anticipated Next Steps:

Continue review of the AE application.



## Revised Mt Poso AE area

Modified proposal area which has been reduced from ~ 260 acres to ~ 144 acres.

AOR of the injection wells falls outside the current AE boundary.

The proposal is to convert from WD to WF.

No change to Conduit analysis.

